This index includes all the material published in Practical Tax Strategies and Taxation for Accountants, Volume 61, July 1998 - December 1998

ACCOUNTING

Bar review teacher barred from deferring income, 61 TA 190, Sep98

Business related deficiency interest is not deductible, 61 TA 41 Jul98

Cell phone commissions are capital expenses, 61 TA 43, Jul98

Chartering yacht through broker is not material participation, 61 TA 43, Jul98

Elect out of tax on small business stock, 61 TA 193, Oct98

Environmental remediation cost election, 61 TA 193, Oct98

Financing arrangement could trigger deductible losses, 61 PTS 366, Dec98

Getting title to goods leads to accrual method, 61 PTS 302, Nov98

If activity is not a business, the loss is capital, 61 PTS 368, Dec98

Lease rollover fee was capital expense 61 PTS 301, Nov98

Leased cars qualify for mileage allowance 61 PTS 257, Nov98

No deduction for 'paying' interest with lender's funds, 61 TA 108, Aug98

No election means no expensing deduction, 61 TA 42, Jul98

No self-employment tax on land conservation, 61 TA 191, Sep98

Not all goods are inventory—or all accrual methods superior to cash, 61 TA 108, Aug98

Package design cost capitalization, 61 TA 109, Aug98

Performance permits deduction prior to payment, 61 PTS 301, Nov98

Prospect of recovery prevents loss deduction, 61 PTS 366, Dec98

Refundable fees are loans, not sales income, 61 PTS 367, Dec98

Simplifying amortization elections for start-up expenses, 61 TA 42, Jul98

Taxable interest carved out of excludable injury settlement, 61 PTS 302, Nov98

Taxpayers may be able to deduct someone else's expenses, *by Steven H. Klein*, 61 TA 149, Sep98

Unify tax and management accounting for inventories, *by Donald Samelson, Paul G. Schloemer, and Mary Stone*, 61 PTS 356, Dec98

COMPENSATION

Full tax exclusion for capped reimbursement payments, 61 TA 120, Aug98

Opportunities abound for making life insurance an executive perk, *by Robert E. Madden*, 61 TA 85, Aug98

Service's measure of reasonable salary found stingy, 61 TA 118, Aug98

Some workers are entitled to a tax-free lunch, 61 TA 175, Sep98

COMPUTERS IN TAX PRACTICE

Return preparer community's future is full of 'windows' *by Cary Parker*, 61 TA 216, Oct98

CORPORATIONS

Accountants say goodbye to firm—without tax on goodwill, 61 TA 129, Sep98

Avoid tax when incorporating with encumbered assets *by Mark R. Martin and James E. Tierney*, 61 PTS 285, Nov98

Corporate form thwarted IRS collections, 61 PTS 257, Nov98

Corporation can deduct expenses paid on another's behalf, 61 TA 51, Jul98

No gain on owner's contribution of leveraged property, 61 TA 50, Jul98

Personal goodwill cuts tax on corporate sale or liquidation *by Scott E. Grimes, Marilyn K. Wiggam, and Timothy T. McDaniel*, 61 PTS 324, Dec98

Planning pays for stock redemptions through related corporations *by Gary L. Maydew*, 61 PTS 338, Dec98

Repayments showed parties intended a loan, 61 PTS 364, Dec98

Responsible person avoids penalty for willful nonpayment, 61 PTS 363, Dec98

Responsible person penalty rules, 61 TA 51, Jul98

Service reallocates fees among related corporations, 61 PTS 363, Dec98

Tangible tax savings from shareholder owning intangibles *by Scott E. Grimes, Marilyn K. Wiggam, and Timothy T. McDaniel*, 61 PTS 260, Nov98

ESTATE PLANNING

Bequest of proceeds, not property, prevented loss deduction, 61 TA 117, Aug98

Conservation easement did not cause recapture of special valuation break, 61 TA 55, Jul98

Double valuation discounts, 61 TA 193, Oct98

Estate planning ideas for qualified small business stock, *by Philip R. Fink*, 61 TA 16, Jul98

Estate tax deferral for real estate, 61 TA 129, Sep98

Excessive professional fees are deductible as theft loss, 61 TA 57, Jul98

Family partnership ignored for valuation purposes, 61 PTS 375, Dec98

Gift tax exclusion for checks expires with donor, 61 TA 180 Sep98

Guidance on valuing compensatory stock options for transfer tax purposes, 61 TA 56, Jul98

Incompetency clause disqualifies trust for marital deduction, 61 TA 115, Aug98

Insurance policy included in estate—absent proper planning, 61 PTS 376, Dec98

Preconditions on stock option exercise, 61 TA 55, Jul98

Private annuity passes wealth to family members—other than Uncle Sam, *by Merrie Jeanne Webel*, 61 TA 68, Aug98

'Private' split-dollar provides transfer tax savings, *by Robert J. Adler*, 61 TA 196, Oct98

QTIP final regulations offer refund opportunity, 61 TA 254, Oct98

Restrictions and potential tax reduce stock valuations, 61 TA 115, Aug98

Stock gift reduced for built-in capital gains, 61 TA 254, Oct98

Two-year refund period applies to estate tax installments, 61 TA 181, Sep98

Wrong wording kills exclusion for limited partnership interest gifts, *by Robert J. Adler*, 61 TA 80, Aug98

INTERNATIONAL

Shrinking world expands relevance of international tax concepts, *by William Zink*, 61 TA 158, Sep98

PARTNERSHIPS

Allocation confusion for partnership deficit capital accounts, *by Joseph G. Walsh*, 61 TA 29, Jul98

Giver must get to have a like-kind exchange, 61 TA 126, Aug98

Partnerships join in magnetic media filing, 61 PTS 321, Dec98

PERSONAL

Ask and ye shall receive reimbursements—or qualify for deduction, 61 TA 251, Oct98

Attorney's fees award is income to plaintiff, 61 PTS 257, Nov98

Business or nonbusiness debt: dominant motive is the question, 61 TA 178, Sep98

Cannot shift tax on income after earned, 61 TA 122, Aug98

On tour but not "away from home," 61 TA 61, July98

Option expiration date governs valuation, 61 TA 178, Sep98

Profit motive breeds deductible losses, 61 TA 249, Oct98

Rental of home to farm, 61 TA 63, Jul98

Return preparer's assurances may make spouse 'innocent,' *by Ellen D. Cook*, 61 TA 203, Oct98

Securities trader's losses not ordinary without customers, 61 TA 122, Aug98

Tax Court maps out rules of the road for travel deductions, 61 TA 179, Sep98

Tax tips for starting up a sideline business, *by Steven C. Thompson and Randy K. Serrett*, 61 TA 166, Sep98

'Use' of principal residence does not require occupancy, 61 TA 60, Jul98

PRACTICING BEFORE THE IRS

Actual receipt suffices even if notice not sent to last know address, 61 TA 183, Sep98

Bankruptcy tolls limitations period even if subject to an extension, 61 TA 184, Sep98

Closing agreement prevented innocent spouse relief, 61 TA 111, Aug98

Deposit vs. payment affects period for claiming refund, 61 PTS 371, Dec98

Document 'filing' occurs when received by Service's mail room, 61 TA 112, Aug98

Employees can sue after employer made refund claim, 61 TA 182, Sep98

Erroneous refund did not revive previous assessment, 61 PTS 372, Dec98

IRS flunked even low standard for third-party summons enforcement, 61 TA 248, Oct98

IRS lacks right to tax preparation software and its source code, 61 TA 47, Jul98

IRS lacks superior rights to levy property, 61 TA 45, Jul98

IRS lien was superior to a state's lien, 61 TA 47, Jul98

Keeping company afloat was not reasonable cause, 61 PTS 370, Dec98

Notice sent before final regulations issued was valid, 61 PTS 305, Nov98

Person may sue for refund of taxes paid on behalf of another, 61 PTS 305, Nov98

'Responsible person' can have addiction, 61 PTS 304, Nov98

Service can reject amended returns after deficiency notice, 61 TA 111, Aug98

Service has indefinite time to decide interest refund, 61 PTS 371, Dec98

Service may collect amount reported on return—despite lower amended return, 61 TA 246, Oct98

Service properly withheld documents sought under FOIA, 61 PTS 306, Nov98

Settlement offer was conditioned on taxpayer's executing Form 870-P, 61 TA 113, Aug98

Summary stipulated decision was not a determination for mitigation purposes, 61 TA 45, Jul98

Tax matter partners under criminal investigation cannot bind partnership, 61 TA 183, Sep98

Three cases dismissed because taxpayers missed deadlines, 61 TA 245, Oct98

PROCEDURE

Attorney's fees awarded, 61 TA 1, Jul98

Bounty on bogus refunds, 61 TA 193, Oct98

Combined federal-state filing, 61 TA 1, Jul98

Election needed to waive NOL carryback period, 61 PTS 309, Nov98

Factual evidence was substantial authority, 61 PTS 308, Nov98

Financial difficulty may be reasonable cause for lateness, 61 TA 186, Sep98

Get the best deal for clients from the IRS collection division, *by Richard A. Carpenter*, 61 TA 97, Aug98

Guidance on intermediate sanctions for charities, 61 TA 129, Sep98

Improper installment agreement terminations halted, 61 TA 1, Jul98

Information returns on magnetic media, 61 TA 65, Aug98

Interest rates unchanged, 61 TA 65, Aug98

IRS pulls plug on electronic return retention proposal, 61 TA 1, Jul98

Less frequent deposits for small businesses, 61 TA 1, Jul98

New law empowers taxpayers in collection disputes, *by Gerald A. Kafka*, 61 PTS 330, Dec98

New law expands innocent spouse relief and creates election, *by Robert S. Steinberg*, 61 PTS 280, Nov98

No recovery for malpractice without damage, 61 PTS 321, Dec98

Pension COLA is flat, 61 PTS, Dec98

Post-return expenses reduce estate's fraud penalty, 61 TA 186, Sep98

Prudent practitioners guard against return preparer penalties, *by Susan A. Berson*, 61 TA 144, Sep98

Saved by the bell (or left at the station): limitations periods count, *by Richard A. Carpenter*, 61 TA 209, Oct98

Sweeping legislation gives the IRS a friendlier face, *by Rita A. Cavanagh*, 61 PTS 269, Nov98

Tax planning should accompany bankruptcy filings, *by Lisa Ivancic and Richard E. Coppage*, 61 TA 22, Jul98

QUALIFIED PLANS

For penalty-free IRA distributions, timing is everything, 61 PTS 318, Nov98

Innovative retirement plan design can favor key employees, *by Lisa C. Germano and Brenda L. Will*, 61 PTS, Nov98

IRA reconversions limited, 61 PTS 321, Dec98

Never old enough for preretirement distributions, 61 TA 65, Aug98

Plan trustees can make good on bad investments, 61 TA 176, Sep98

Post-year-end contributions deductible only if for prior year's work, 61 PTS 318, Nov98

Proposed regs. offer quidance on Roth IRAs, 61 TA 243, Oct98

S corporations owned by ESOPs present tax exemption opportunity, *by Scott E. Grimes, Marilyn K. Wiggam, and Tim Jochim*, 61 TA 4, Jul98

Taxpayer 'received' distribution even if he did not want it, 61 TA 119, Aug98

REAL ESTATE

Amount realized is FMV, not price paid, 61 PTS 313, Nov98

Court approves rent paid to a related party, 61 PTS 314, Nov98

Never living there does not make a house investment property, 61 PTS 380, Dec98

Qualified nonrecourse financing regs., 61 PTS 313, Nov98

Self-rental rule precludes passive loss deductions, 61 PTS 380, Dec98

S CORPORATIONS

New basis rules for partnership property distributions, *by Richard M. Walter and Robert C. Ricketts*, 61 TA 10, Jul98

Prop. regs. explain S corporation pass-through rules, 61 PTS 310, Nov98

S corporation income passes through to beneficial owner, 61 PTS 311, Nov98

S corporations now can have subsidiaries—but proceed with caution, *by Michael Schlesinger*, 61 TA 132, Sep98

S election does not remove relevance of SFAS no. 109, *by Ronald G. Caso*, 61 TA 77, Aug98

Substantial compliance, 61 TA 126, Aug98

AUTHOR INDEX

Robert J. Adler	80, 196
Susan A. Berson	144
Richard A. Carpenter	97, 209
Ronald G. Caso	77
Rita A. Cavanagh	269
Ellen D. Cook	203
Richard E. Coppage	22
Philip R. Fink	16
Lisa C. Germano	61
Scott E. Grimes	4, 260, 324
Lisa Ivancic	22
Tim Jochim	4
Gerald A. Kafka	330
Steven H. Klein	149
Robert E. Madden	85
Mark R. Martin	285
Gary L. Maydew	338
Timothy T. McDaniel	260, 324
Cary Parker	216
Robert C. Ricketts	10
Donald Samelson	356
Michael Schlesinger	132
Paul G. Schloemer	356
Randy K. Serrett	166
Robert S. Steinberg	280
Mary Stone	356
James E. Tierney	285
Steven C. Thompson	166
Joseph G. Walsh	29
Richard M. Walter	10
Merrie Jeanne Webel	68
Marilyn K. Wiggam	4, 260, 324
Brenda L. Will	61
William Zink	158